KENNETH CARUSO LAW

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April 18, 2024

Hon. Paul G. Gardephe United States District Judge 40 Foley Square New York, NY 10007

Re: United States of America v. Robert Wisnicki

22 Cr. 20 (PGG)

Dear Judge Gardephe:

I represent Robert Wisnicki. As the Court will recall, Your Honor sentenced Mr. Wisnicki to a term of 78 months in prison and fixed a surrender date of May 15, 2024. I ask the Court to treat this letter as a motion to postpone the surrender date to Monday, June 17, 2024. (The end of the preceding week involves a religious holiday.)

The reasons for this request are set forth in the letter, attached as Exhibit A, from Charles Wertman, Esq., who represents Mr. Wisnicki and his former law firms in pending bankruptcy cases. In brief, the extension would facilitate Mr. Wisnicki's ongoing cooperation with the two court-appointed bankruptcy trustees, who are conducting investigations for the purpose of recovering assets that can be paid to victims. As set forth in a letter from one of those trustees (Exhibit B), Mr. Wisnicki's "continued participation and assistance is crucial in aiding with the administration of the bankruptcy estate and asset recovery efforts and assessing validity of claims." It is respectfully submitted that Mr. Wisnicki's continued in-person participation in these efforts, while outside of prison, will maximize the likelihood of success.

Respectfully Submitted,

/s/ Kenneth A. Caruso Kenneth A. Caruso

MEMO ENDORSED: The application is granted. Defendant Wisnicki's surrender date is adjourned to **June 17, 2024**. The surrender date will not be further extended.

SO ORDERED.

Paul G. Gardephe

United States District Judge

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Date: April 19, 2024